

DEPARTMENT OF FOOD AND AGRICULTURE

A.G. KAWAMURA, Secretary

Integrated Pest Control Branch
1220 N Street, Room A-357
Sacramento, CA 95814
Phone: (916) 654-0768
Fax: (916) 653-2403




January 5, 2006

Mr. Brian Amme, Project Manager
Vegetation Environmental Impact Statement
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520-0006

Dear Mr. Amme:

- 1 My staff has recently had the opportunity to review your "Bureau of Land Management (BLM) Draft Vegetation Treatments Using Herbicides Programmatic Environmental Impact Statement (EIS)." I am writing to lend the California Department of Food and Agriculture (CDFA), Noxious Weed Program's full support of the preferred alternative, Alternative B to expand herbicide use and allow for the use of new herbicides in 17 western states. We strongly oppose all other alternatives as they are inadequate for the effective and efficacious treatment and eradication of noxious and invasive weeds.
- 2 The BLM is to be congratulated on its continued promotion of the safe and effective use of herbicides as is outlined in the document. We are in support of the developed "protocol for identifying, evaluating, and using new herbicides" to facilitate evaluation and the addition of new chemicals as they become available in the future. The United States Environmental Protection Agency approves herbicides under the Federal Insecticide, Fungicide, and Rodenticide Act registration process. Any additional screening would be duplication of effort and not necessary.
- 3 I was pleased to see that your Draft EIS recognizes the many impacts that noxious weeds have on the landscape if left untreated. Actions outlined in this draft EIS will promote ecosystem health of BLM lands by maintaining and improving native forb and grass species, ultimately preventing the loss of wildlife habitat. Failure to immediately and aggressively eradicate these small noxious weed sites will result in their further spread, which will cause adverse impacts to humans, animals, both domestic and wild, and native plant communities.
- 4 The CDFA is mandated to work towards eradication of A-rated noxious weeds in the state and has a long history of cooperating with county, state and federal agencies in accomplishing this goal. The CDFA's Noxious Weed Program looks forward to a continued working relationship with the BLM in the eradication of A-rated noxious weeds throughout California. If I can be of any further assistance, please contact me at the above telephone number.

Sincerely,


Larry G. Bezark, Chief
Integrated Pest Control Branch
Plant Health and Pest Prevention Services